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July 20, 2018

**BY FEDERAL EXPRESS**

Honorable Susan D. Wigenton, U.S.D.J.  
**Martin Luther King, Jr. Federal Building**  
**& U.S. Courthouse**  
50 Walnut Street  
Newark, New Jersey 07101

**Re: *Juul Labs, Inc. v. King Distribution LLC, et al.***  
**Civil Action No. 18-9233 (SDW)**

Dear Judge Wigenton:

Our firm, along with our co-counsel Sterne, Kessler, Goldstein & Fox, P.L.L.C., represents Plaintiff Juul Labs, Inc. ("Juul") in this temporarily sealed matter. We submit this letter to respectfully request that the Court unseal the docket and implement the below procedure to permit the sealing of certain confidential business information found in the parties' filings to date. Defendants have consented to the within relief, and have authorized us to represent same to Your Honor.

Juul respectfully requests that the Court adopt the following procedure in order to permit the sealing of confidential business information found in the parties' filings to date, which heretofore have been sealed in whole: Upon the entry of an order unsealing this matter, all individual filings would remain sealed and the parties would have fourteen (14) days to file public copies of such materials, redacted pursuant to L.Civ.R. 5.3(c), and to file any motion to permanently seal any redacted materials under L.Civ.R. 5.3(c) with the Court.

If this application meets with the Court's approval, we respectfully request that Your Honor execute the below form of endorsement and have it entered on the docket.

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We thank the Court for its consideration and continued assistance in this matter.

Respectfully submitted,



Jakob B. Halpern

JBH/sr

c: All counsel of record

SO ORDERED:

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HON. SUSAN D. WIGENTON, U.S.D.J.